## **EXHIBIT E**

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A limited liability partnership formed in the State of Delaware

REED SMITH LLP

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Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively, "Bard") hereby file the
Notice of Pendency of Other Actions or Proceedings. This case is one of dozens of civil actions
nationwide alleging personal injuries resulting from the use of Bard's line of inferior vena cava
("IVC") filters. Bard hereby notifies the Court and all parties and their counsel that cases alleging
personal injuries resulting from the use of Bard's IVC filters, including the Bard Recovery® Filter
issue in this case, have been coordinated in the Multidistrict Litigation In re: Bard IVC Filters
Products Liability Litigation (MDL 2641), pending in the District of Arizona.

Bard further discloses the following civil action formerly pending in the Northern District of California, which has already been transferred to MDL 2641:

Rouse v. C.R. Bard, Inc. et al., 5:15-cv-04569-BLF (N.D. Cal.).

Additionally, other Bard IVC filter-related cases are currently pending in state and federal courts throughout the United States. Accordingly, transfer of this matter should be effected pursuant to 28 U.S.C. § 1407 (multidistrict litigation) to avoid conflicts, conserve resources, and promote an efficient determination of this action.

DATED: November 12, 2015

## REED SMITH LLP

By: /s/ Steven J. Boranian Steven J. Boranian Mark A. Sentenac Attorneys for Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc.